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Air Emissions Reporting Requirements (AERR) Rule

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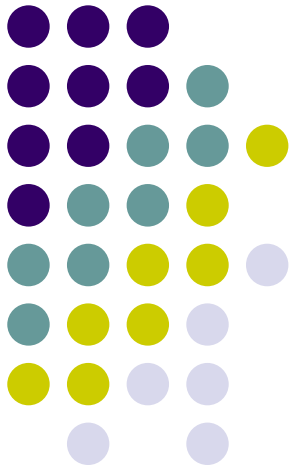

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Why Was the AERR Developed?

- Early emissions reporting requirements were located in several areas of the Code of Federal Regulations (CFR)
- The Consolidated Emissions Reporting Rule (CERR) initiated the process of organizing and simplifying emissions reporting requirements
- The AERR continued to organize and simplify emissions reporting requirement by:
  - Harmonizing CERR and NOx SIP Call reporting requirements
  - Deleting, adding and revising data elements to update reporting requirements

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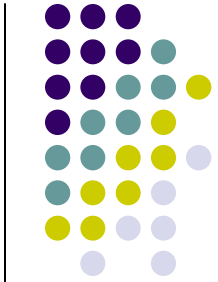
Who Needs to Report?



- States are responsible for reporting emissions from sources on non-tribal lands
- If local agencies have the lead role for developing emission inventories or inventory categories, the AERR also applies to them
- The AERR can apply to tribes that have been granted “treatment as state” status under the Tribal Authority Rule and have approval to implement rules through a Tribal Implementation Plan.

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When Will the AERR be Implemented?

- Implementation begins with the 2009 inventory
- 2009 and 2010 will be Type A source reporting years
- 2011 will be the first triennial (comprehensive) inventory
- Therefore, states will have two years of large point source data reporting to become familiar with the new AERR and EIS requirements before a comprehensive inventory is required

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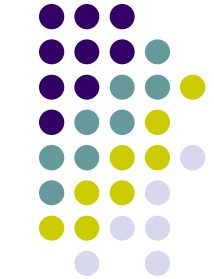
Reporting Changes in AERR



- 40 CFR 70 definition of major source now used for point source reporting
- The AERR requires emissions to be reported within 12 months from the end of the inventory year rather than 17 months under the CERR
- No biogenic emissions requirement

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Reporting Changes in AERR (con't)

- Model inputs in lieu of emissions will be acceptable
- Data elements for reporting have been updated
- Summer day emissions of VOC and NOx for ozone nonattainment areas only
- Winter work weekday emissions of CO required for nonattainment areas and areas with maintenance plans.

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Reporting Changes in AERR (con't)

- Particulate Matter
  - PM primary (sum of filterable and condensible components) must be reported as under the CERR
  - Reporting of the filterable and condensible components is a new requirement
  - We added the component reporting requirement to help us understand what was being reported as PM primary

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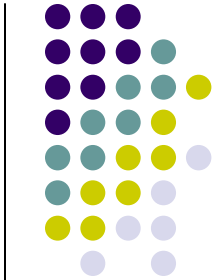
What are the Reporting Cycles and Averaging Times?



- Every Year Cycle Reporting
  - Annual emissions from Type A (large) point sources. If one pollutant qualifies source as Type A, all pollutants must be reported
  - Ozone season and summer day emissions of NOx from sources controlled to meet SIP Call requirements

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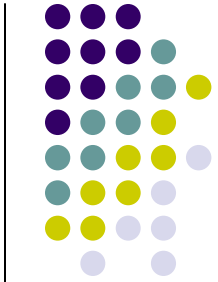
What are the Reporting Cycles and Averaging Times (con't)?



- Three Year Cycle Reporting
  - Annual emissions of criteria pollutants from all sources
  - Ozone season and summer day emissions of NOx from all sources
  - Summer day emissions of NOx and VOC for ozone nonattainment areas
  - Winter work week day emissions of CO for nonattainment areas and attainment areas with maintenance plans

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What Pollutants Need to be Reported?

- States must report emissions of the following pollutants:
  - Volatile Organic Compounds (VOC)
  - Primary $PM_{2.5}$
  - Primary PM_{10}
  - Nitrogen Oxides ($NO_{x)}$
  - Carbon Monoxide (CO)
  - Lead and Lead Compounds (Pb)
  - Sulfur Dioxide (SO_2)
  - Ammonia (NH_3)

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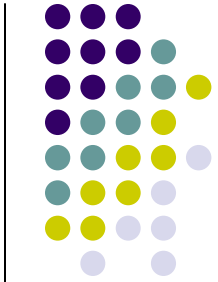
What About HAPs and GHGs?



- Hazardous Air Pollutants (HAPs) are not required, but we encourage agencies to submit them on a voluntary basis using the requirements of the AERR
- Greenhouse Gases (GHGs) are not required

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Will Point Source Reporting for Pb be Changed?

- The Pb NAAQS final rulemaking was promulgated on October 15, 2008 and changed the Pb emission inventory point source threshold from 5 tons/year to 0.5 tons/year
- We intend to revise the 5 tons/year threshold for Pb point sources in the AERR to help identify the potential for Pb point source problems in attainment/unclassifiable areas under the new Pb NAAQS

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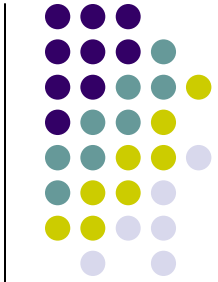
Early Data Submittal Program



- EPA is interested in encouraging states to submit data by 12/31/09 for the 2008 inventory year
- States that participate in the Early Data Submittal Program will receive recognition from EPA
- Additional details on the Early Data Submittal Program will communicated via the NEI Listserv